

STATE OF NEVADA
OFFICE OF THE SECRETARY OF STATE
SECURITIES DIVISION

2250 LAS VEGAS BOULEVARD NORTH, SUITE 400
NORTH LAS VEGAS, NEVADA 89030

In the Matter of:

**PAGANELLI ENTERPRISES, LLC,
CHRISTOPHER DINO PAGANELLI, and
AP HEDGE a/k/a APHEDGE, a/k/a
ADVANTAGE PLAYER HEDGE**

Respondents.

SUMMARY ORDER

File No. INV21-191

**TO: Paganelli Enterprises, LLC and Christopher Dino Paganelli
5997 Kylie Street
Las Vegas, NV 89130**

**AP Hedge/APHedge/Advantage Player Hedge
5997 Kylie Street
Las Vegas, NV 89130**

NEVADA SECRETARY OF STATE SECURITIES DIVISION
DATE FILED: <u>01-25-2022</u>
By: <u>[Signature]</u>

ORDER

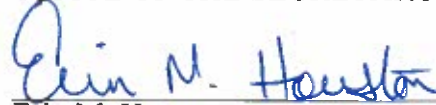
This Order is issued in response to the above-captioned Respondents promoting gambling investments across various media, including their own website, Instagram, and Craigslist. These advertisements proclaim that a person can earn a 10% daily return on a gambling investment made through the Respondents. As detailed in the circulars, craigslist advertisements, Instagram handles, and the AP Hedge Website, the investment opportunity is a security and both the promoters and the security itself should have been registered or should have sought an exemption. All Respondents are residents of Nevada and never registered with the Nevada Securities Division nor sought an exemption.

Therefore, because Respondents did not apply for registration or seek an exemption, and pursuant to the authority granted the Administrator at NRS 90.800(1), and good cause appearing, any exemption potentially available to the above captioned Respondents in connection with gambling investments is hereby revoked pursuant to NRS 90.550.

1 Respondents have fifteen (15) days upon receipt of this notice to mail a written request for a
2 hearing to the Administrator. *Id* at (2). A failure to request a hearing within this time period will make
3 the Summary Order final.

4 Respectfully submitted this 25th day of January, 2022.

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6 NEVADA SECURITIES DIVISION
OFFICE OF THE SECRETARY OF STATE

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8 Erin M. Houston
9 Deputy Secretary for Securities
Securities Administrator
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1 **CERTIFICATE OF MAILING**

2 I certify that I am an employee of the Securities Division of the Office of the Secretary of
3 State, State of Nevada, and that on this 25th day of January, 2022, I have caused a true and correct
4 copy of the foregoing Complaint to be served by United States Certified Mail, Return Receipt
5 Requested, and First Class Mail, to the following:

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7 **Paganelli Enterprises, LLC**
8 **5997 Kylie Street**
9 **Las Vegas, NV 89130**

10 **Christopher Dino Paganelli**
11 **5997 Kylie Street**
12 **Las Vegas, NV 89130**

13 **AP Hedge/APHedge/Advantage Player Hedge**
14 **5997 Kylie Street**
15 **Las Vegas, NV 89130**

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18 Employee of the Nevada Securities Division
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